

STATE OF SOUTH CAROLINA)
 COUNTY OF RICHLAND)
 D. Chad Lamoreaux, M.D. and Heidi Lamoreaux,)
 Plaintiff)
 v.)
 Palmetto Health; Charles D. Beaman, Jr., Et Al.)
 Defendant.)

) IN THE COURT OF COMMON PLEAS
 CASE NO.
 2009-CP-40-1044
 MOTION AND ORDER INFORMATION
 FORM AND COVER SHEET

Plaintiff's Attorney: David E. Rothstein, Esq., Bar No. Burnette & Rothstein, P.A. Address: 2322 Devine Street Columbia, South Carolina 29205 phone: 803-251-0202 fax: 803-251-0222 e-mail: derothstein@mindspring.com other:	Defendant's Attorney: Katherine Dudley Helms, Bar No. 2907 Ogletree, Deakins, Nash, Smoak & Stewart, P.C. Address: 1320 Main Street, Suite 600 Columbia, South Carolina 29201 phone: 803-252-1300 fax: 803-254-6517 e-mail: kathy.helms@ogletreedeakins.com other:
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- MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)
 FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)
 PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

SECTION I: Hearing Information

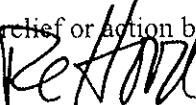
Nature of Motion: Motion for Protective Order

Estimated Time Needed: 30 min. Court Reporter Needed: YES / NO

SECTION II: Motion/Order Type

- Written motion attached
 Form Motion/Order

I hereby move for relief or action by the court as set forth in the attached proposed order.


 Signature of Attorney for Plaintiff / Defendant Witness Date submitted

May 5, 2009

SECTION III: Motion Fee

- PAID – AMOUNT: \$25.00
 EXEMPT: Rule to Show Cause in Child or Spousal Support
 (check reason) Domestic Abuse or Abuse and Neglect
 Indigent Status State Agency v. Indigent Party
 Sexually Violent Predator Act Post-Conviction Relief
 Motion for Stay in Bankruptcy
 Motion for Publication Motion for Execution (Rule 69, SCRCP)
 Proposed order submitted at request of the court; or,
 reduced to writing from motion made in open court per judge's instructions

Name of Court Reporter:

Other:

JUDGE'S SECTION

- Motion Fee to be paid upon filing of the attached order.
 Other:

JUDGE _____

CODE: _____ Date: _____

CLERK'S VERIFICATION

Date Filed:

Collected by: _____

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
))	
COUNTY OF RICHLAND)	CIVIL ACTION NO. 2009-CP-40-1044
D. Chad Lamoreaux, M.D., and)	
Heidi Lamoreaux,)	
))	
Plaintiffs,)	
))	
vs.)	
))	
Palmetto Health; Charles D. Beaman,)	MOTION FOR PROTECTIVE ORDER
Jr., in his individual and official)	
capacities; James L. Raymond, in his)	
individual and official capacities;)	
Katherine G. Stephens, in her individual)	
and official capacities; University of)	
South Carolina School of Medicine;)	
Donald J. DiPette, M.D., in his)	
individual and official capacities; John)	
J. Walsh, IV, M.D., in his individual)	
and official capacities; and David E.)	
Koon, M.D., in his individual and)	
official capacities,)	
))	
Defendants.)	
))	

Comes now Gene Massey, by and through his undersigned counsel of record, and move this Honorable Court for an Order limiting the examination of the Deposition of Gene Massey. Plaintiffs deposed Gene Massey on April 30, 2009. Gene Massey declined to answer questions pursuant to his Fifth Amendment privilege (as incorporated to the states by way of the Fourteenth Amendment). To the extent Rule 30(d) requires Massey to file a motion to perfect his privilege, this motion requests like protection.

RESPECTFULLY SUBMITTED, this 5th day of May, 2009.



Mario A. Papella
 Robert E. Hood
 Strom Law Firm, LLC
 2110 Beltline Boulevard, Suite A
 Columbia, South Carolina 29204
 (803)252-4800

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
)
COUNTY OF RICHLAND) CIVIL ACTION NO. 2009-CP-40-1044

D. Chad Lamoreaux, M.D., and)
Heidi Lamoreaux,)
)
 Plaintiffs,)
)
vs.)
)
Palmetto Health; Charles D. Beaman,) CERTIFICATE OF SERVICE
Jr., in his individual and official)
capacities; James L. Raymond, in his)
individual and official capacities;)
Katherine G. Stephens, in her individual)
and official capacities; University of)
South Carolina School of Medicine;)
Donald J. DiPette, M.D., in his)
individual and official capacities; John)
J. Walsh, IV, M.D., in his individual)
and official capacities; and David E.)
Koon, M.D., in his individual and)
official capacities,)
 Defendants.)
)

I Betty P. Cosby, an employee of the Strom Law Firm, LLC, do hereby certify that I have this _____ day of May, 2009, served the Motion for Protective Order on the following by placing in the U.S. Mail, proper postage affixed.

David E. Rothstein, Esquire
Burnette & Rothstein, P.A.
2322 Devine Street
Columbia, South Carolina 29205

Katherine Dudley Helms
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Vance J. Bettis, Esq.
Shahin Vafai, Esq.
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Betty P. Cosby

Columbia, South Carolina
May 5th, 2009